UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA <i>ex rel</i> . BROOK JACKSON,)
Plaintiff,)
v.) Civil Action No.: 1:21-cv-00008-MJT
VENTAVIA RESEARCH GROUP, LLC; PFIZER, INC.; ICON, PLC)))
Defendants.))

DECLARATION OF MEAGAN D. SELF IN SUPPORT OF PFIZER'S MOTION TO STAY DISCOVERY

Meagan D. Self declares pursuant to 28 U.S.C. § 1746:

- 1. I am a member of the bar of the State of Texas and am admitted to the bar of this Court. I am an attorney with the law firm of DLA Piper LLP (US), attorneys for Defendant Pfizer Inc. ("Pfizer") in this action.
- 2. This declaration, together with the annexed exhibits, is being submitted in connection with the Pfizer's Motion to Stay Discovery, filed May 17, 2022 (the "Motion").
 - 3. The Motion references documents not previously filed on this Court's docket.
- 4. Defendant submits as exhibits to this Declaration the following documents referenced below:
 - a) Attached hereto as **Exhibit 1** is a true and correct copy of Brook Jackson's website, I Am Brook Jackson, https://www.iambrookjackson.com, which was collected by Teris, a digital forensics company, on April 7, 2022.

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b) Attached hereto as **Exhibit 2** is a true and correct image of Brook Jackson's

website, I Am Brook Jackson, https://www.iambrookjackson.com, as it exists on

May 16, 2022.

c) Attached hereto as **Exhibit 3** is a true and correct copy of Brook Jackson's January

17-18, 2022 Twitter string, which posts this case's caption and paragraphs 13 and

287 from her original complaint in this matter.

d) Attached hereto as **Exhibit 4** is a true and correct copy of Brook Jackson's

September 19, 2021 email, subject line Pain in your [Explicit], which she posted

on her website, I Am Brook Jackson, https://www.iambrookjackson.com.

Dated: May 17, 2022

Dallas, Texas

s/ Meagan D. Self___

Meagan D. Self

Exhibit 1

Case 1:21-cv-00008-MJT	Document 40-1	Filed 05/17/22	Page 4 of 90 PageID #:	1512
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Deliverable Summary

Web Capture Items

Examiner Account Summary

Web Snapshot IABJ20220407

39 39

Total Items:

Am Brook Jackson

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Who Am I Documents

Media

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Contact



My name is Brook Jackson. In September 2020, I was hired as a Regional Director for two of the three clinical trial sites in Texas that were participating in Pfizer's pivotal, Phase III, mRNA ("vaccine") clinical trial. Although my time with this company was brief, the misconduct that I witnessed was so blatant and so widespread that I documented numerous violations of the U.S. Food and Drug Administration (FDA) Code of Federal Regulations every, single day. After repeatedly bringing these concerns to Ventavia's management and to Pfizer directly (although anonymously), I watched in disbelief as they began their efforts to conceal the fraud.

On September 25, 2020, I filed a formal complaint with the FDA and was fired hours later.

Starting October 9, 2020, efforts by Big Pharma and Big Tech have been used to intimidate me and keep me from bringing information forward to the public. I was misled by a team of former attorneys and pressured into filing a

As I watched the roll out of Pfizer's product to millions, the mandates that ensued, the reports of injury and death, I could not be silent anymore. The weight on my heart was just too heavy. Even after being warned by a former $lawyer\ that, "if you break\ the\ seal\ the\ Government\ will\ come\ after\ you", I\ just\ couldn't\ hold\ their\ secret\ any\ longer$ and took the evidence to The BMJ and retained new council.

Earlier this month the case was finally unsealed after the Government declined to intervene in support of the lawsuit. There was never an investigation by the FDA, the Department of Justice, or any other agency. All have refused to investigate the allegations of fraud and misbranding of Pfizer's Covid-19 "vaccine" for nearly a year and a

Since being fired, there have been other former and current employees of Ventavia that have reached out to me. Ventavia continues to be rewarded with additional contracts, new Sponsors, and opportunity to give Big Pharma favorable data no matter the cost.

The information that I have belongs to the entire world. Those involved in this evil, massive, fraudulent scheme to censor and cover up the truth must be held accountable.

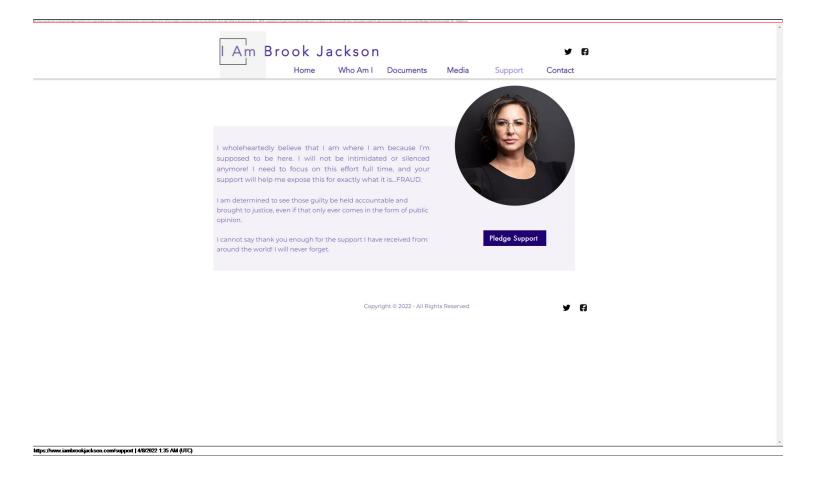
I created this website so that I can share this information and to catalogue related documents.

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Item: IABJ000000003 (Preview)





I have nearly 20 years of experience in clinical research and the pharmaceutical and medical device industry. I have worked for investigative sites, Site Management and Contract Research Organizations. My experience in site-level coordination and a blend of in-house management have led to my success. I have both U.S. and global experience in each phase of clinical trials, and key experience in Gastroenterology, Immunology, and Infectious Diseases.

I have dedicated my career to Clinical Data Sciences. I had confidence in a regulatory process and an agency that was put in place to protect the public health by ensuring vaccines and other biological products are safe and effective. The U.S. Food and Drug Administration quit doing their job a long time ago. It's time for change and resignations, now!

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<u>Metadata</u>

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Pfizer Lawsuit 3 items	951 :	
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Case 1:21-cv-00008-MJT Document 40-1 Filed 05/17/22 Page 13 of 90 PageID #: 1521 Item: IABJ000000008 (Preview) <u>Metadata</u>

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	NTF_Transition from C4591001 to C4591031.pdf 164.28 KB	22 :
	Delegation of Authority Log.pdf	22 :
	Laboratory Sample Processing Log.pdf 12.04 MB	60 :
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	Weekly QC Report_01Apr2021.pdf 247.66 KB	7 :
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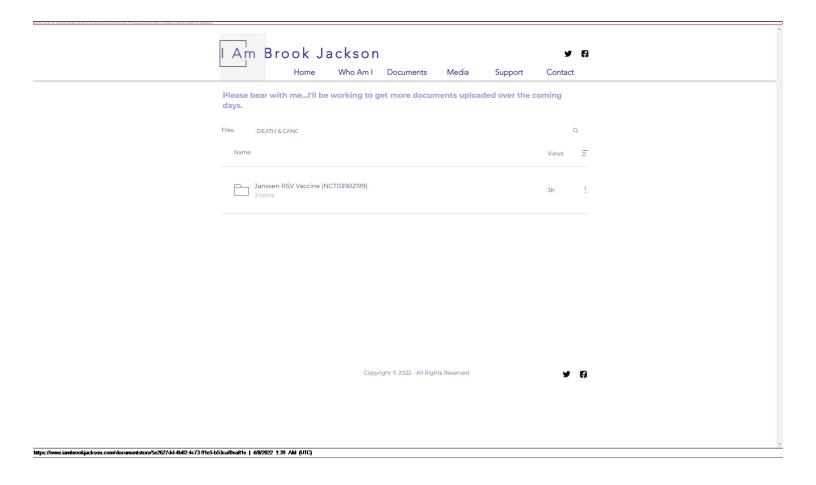
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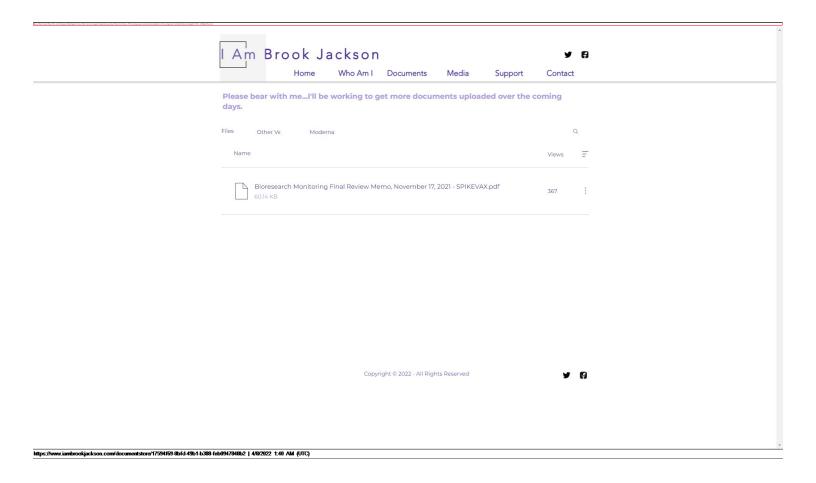
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IMV FU Letter_05May2021.pdf 54.88 KB	764	:
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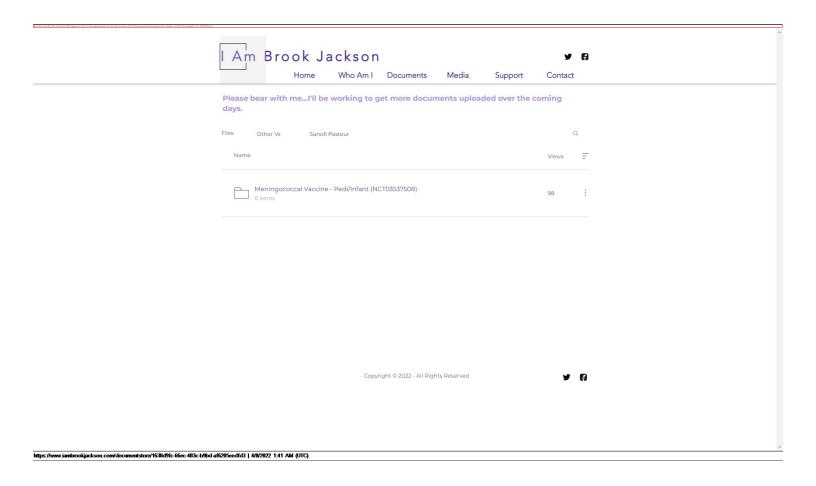
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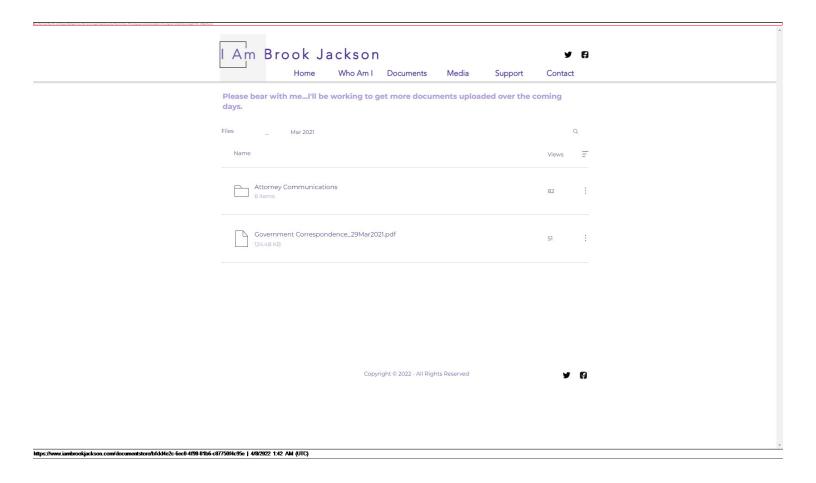
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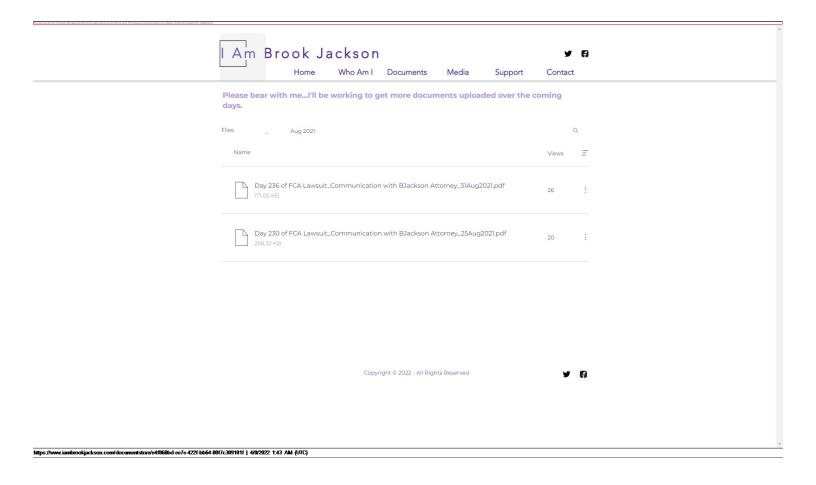
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Day 53 of FCA Lawsuit_Communication with BJackson Attorney_02Mar2021.pdf 30 :
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Case 1:21-cv-00008-MJT Document 40-1 Filed 05/17/22 Page 35 of 90 PageID #: 1543
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b_Case Exhibits 1-10.pdf 14.36 MB	66
c_Case Exhibits 11-20,pdf	50 :
a_Original Complaint_083an2021.pdf	164
Copyright © 2022 - All Rights Reserved	у (9
www.iambrookjackson.com/documentstore/60ba188e-11cd-4380-9a3c-e5a208ec35d7 4/8/2/212 1:42 AM (UTC)	

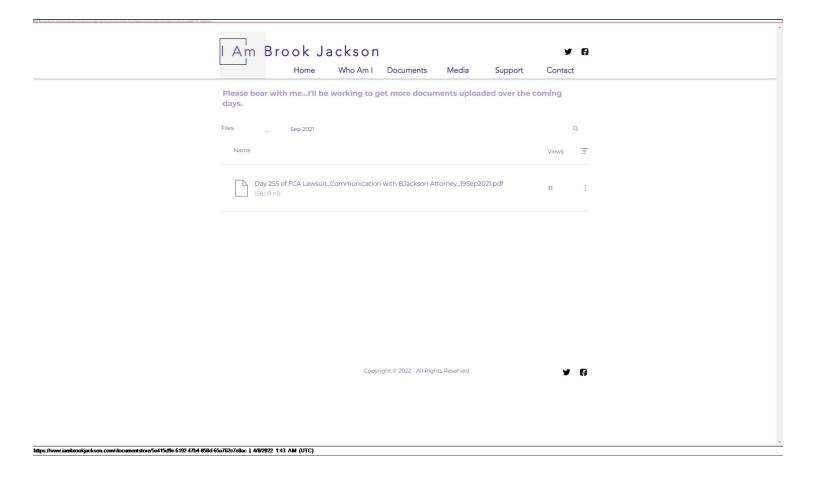
Case 1:21-cv-00008-MJT Document 40-1 Filed 05/17/22 Page 36 of 90 PageID #: 1544

Item: IABJ000000031 (Preview)



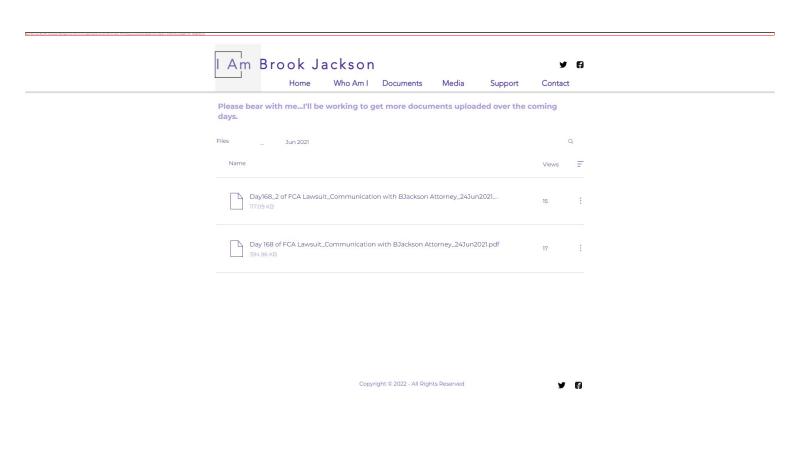
Case 1:21-cv-00008-MJT Document 40-1 Filed 05/17/22 Page 37 of 90 PageID #: 1545

Item: IABJ000000032 (Preview)



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Item: IABJ0000000033 (Preview)



https://www.iambrookjackson.com/documentstore/e272ee36-790c 402b-96ba-8e1c1393efc0 | 4/8/2022 1:43 AM (UTC)

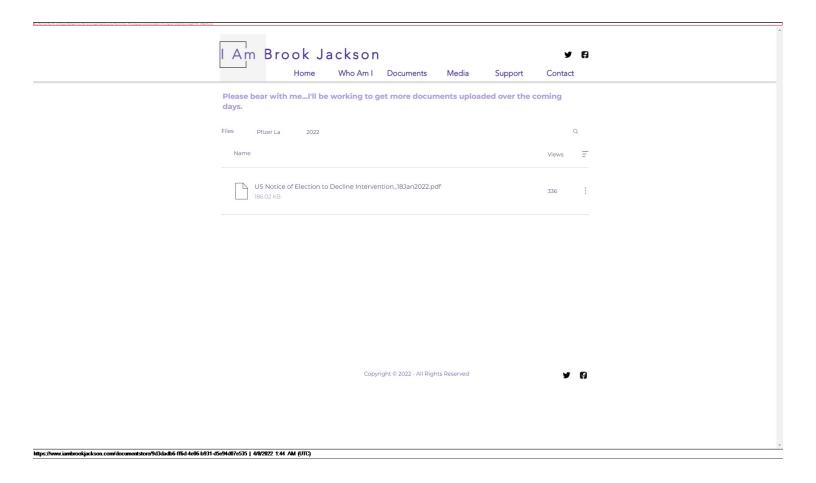
Case 1:21-cv-00008-MJT Document 40-1 Filed 05/17/22 Page 39 of 90 PageID #: 1547

Item: IABJ000000034 (Preview)



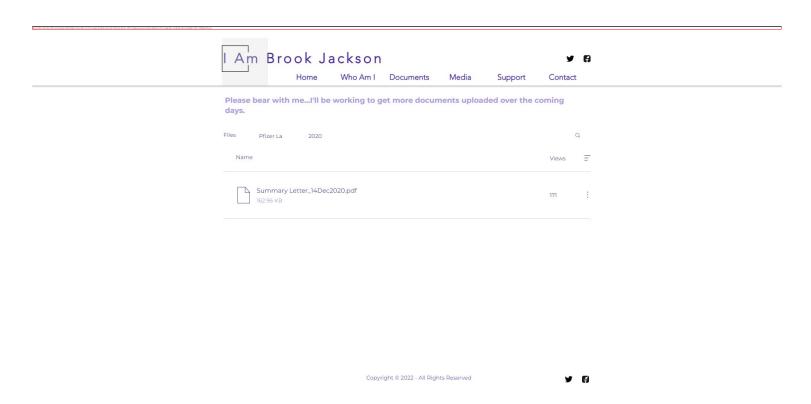
Case 1:21-cv-00008-MJT Document 40-1 Filed 05/17/22 Page 40 of 90 PageID #: 1548

Item: IABJ0000000035 (Preview)



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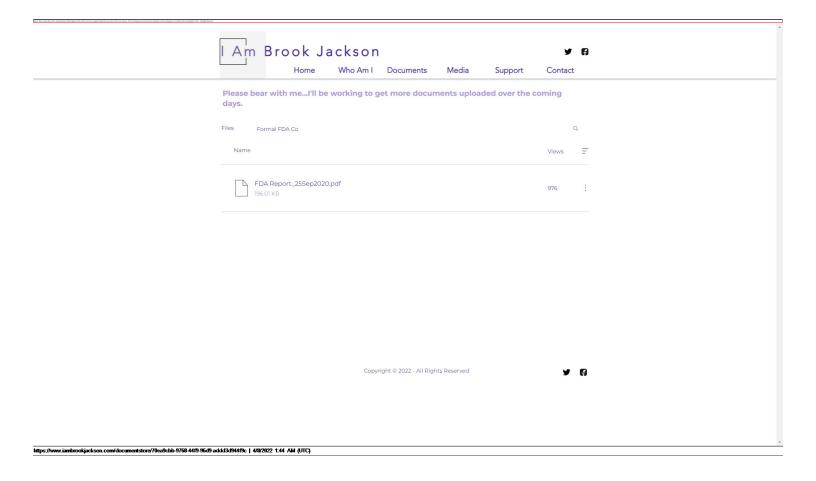
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Item: IABJ000000037 (Preview)



Am Brook Jackson

Y 8

Who Am I

Documents

Media

Support

Contact



March 16, 2022



March 16, 2022





Zee Media March 15, 2022



March 13, 2022







The British Medical Journal November 2, 2021



March 9, 2022

March 5, 2022

Bombshell Brook Jackson Blows the Whistle on Pfizer...

Did Pfizer commit fraud during the clinical trial for the jab?

Listen Now (Click on "March 16, 2022" episode, No title)

Bombshell Brook Jackson Blows the Whistle on Pfizer...

'Overtime Content" (audio file download)

A vaccinator on the Pfizer trial had no medical experience at all

I spoke with Brook Jackson last week. Brook is a named whistleblower who wanted to draw attention to poor practices on the Pfizer vaccine trial, Ordinarily, her story would be absolutely huge but in these times of algorithmically driven censorship, no one has really heard her story...

Brook Jackson: Pfizer Whistleblower Exposes UNDENIABLE Pharma Fraud - Sues Pfizer

Brook Jackson is a whistleblower and clinical trial expert who spent time overseeing the Pfize COVID-19 "Vaccine" trials in Texas, where the things she witnessed were beyond shocking...

Watch Now

Whilstleblower Brook Jackson - Pfizer Phase 3 Clinical Trial a Fraud

Brook Jackson Sat down with me this week to talk about her role at Ventavia managing 2 of the 3 trial sites her employer ran for Pfizer. What she has to say is shocking and eye-open

An Interview With Ventavia and Pfizer-BioNTech COVID Vaccine Trial Whistleblower Brook Ja

..Jackson claimed Ventavia committed fraud, put patient safety at risk and engaged in cover ups of errors and malfeasance during its management of Pfizer's clinical trials

An Interview With Ventavia and Pfizer-BioNTech COVID Vaccine Trial Whistleblower Brook Ja

**Audio Interview

Listen Now

UPDATED Covid-19: Researcher blows the whistle on data integrity issues in Pfizer's vaccin

New video content embedded on the page!

Whistle Blower Brook Jackson Pfizer Lied People Died

erican Hero WhistleBlower Brook Jackson was hired to work the Pfizer Stage 3 Vaccine clinical trials in 2020. Brook was hired because of 20 years of experience in the field and an

Watch Now

BOMBSHELL: A Pfizer Clinical Trial Whistleblower Speaks Out

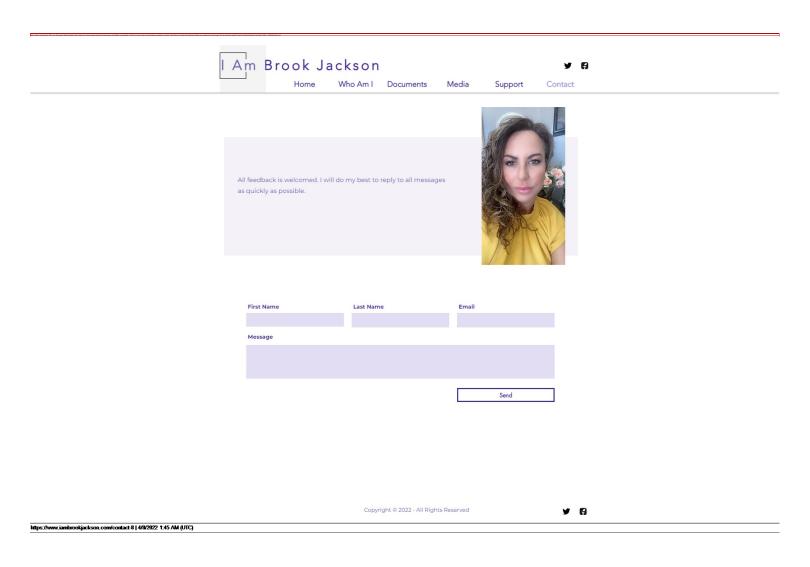
Brook Jackson joins the program to talk about what she learned and why she felt it was important to expose the conspiracy behind the shot. She talks about her lawsuit against Pfizer and how the evidence is being suppressed by the medical establishment at every turn Watch Now

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Item: IABJ000000039 (Preview)



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MD5 hash version	v6
URL	https://www.iambrookjackson.com/
Page Title	IAmBrookJackson-CovidClinicalTrialWhistleblower
URI	ws://IABJ20220407/1649381693014

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Field Name	Value
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URL	https://www.iambrookjackson.com/support
Page Title	I Am Brook Jackson
URI	ws://IABJ20220407/1649381710076

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URL	https://www.iambrookjackson.com/whoami
Page Title	Who Am I I Am Brook Jackson
URI	ws://IABJ20220407/1649381723764

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Page Title	Documents I Am Brook Jackson
URI	ws://IABJ20220407/1649381736985

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Source	WebSnapshot
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Page Title	Documents I Am Brook Jackson
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Case 1:21-cv-00008-MJT Document 40-1 Filed 05/17/22 Page 50 of 90 PageID #: 1558 Item: IABJ000000006 (Metadata) **Preview**

Field Name	Value
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Page Title	Documents I Am Brook Jackson
URI	ws://IABJ20220407/1649381804068

Case 1:21-cv-00008-MJT Document 40-1 Filed 05/17/22 Page 53 of 90 PageID #: 1561 Item: IABJ000000009 (Metadata) **Preview**

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Case 1:21-cv-00008-MJT Document 40-1 Filed 05/17/22 Page 55 of 90 PageID #: 1563 Item: IABJ0000000011 (Metadata) **Preview**

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URI	ws://IABJ20220407/1649381870160

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URI	ws://IABJ20220407/1649381889453

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Page Title	Documents I Am Brook Jackson
URI	ws://IABJ20220407/1649381907681

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Page Title	Documents I Am Brook Jackson
URI	ws://IABJ20220407/1649381923407

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URI	ws://IABJ20220407/1649381941699

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MD5 hash version	v6
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Page Title	Documents I Am Brook Jackson
URI	ws://IABJ20220407/1649382023863

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MD5 hash version	v6
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Page Title	Documents I Am Brook Jackson
URI	ws://IABJ20220407/1649382042153

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Page Title	Documents I Am Brook Jackson
URI	ws://IABJ20220407/1649382057868

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Source	WebSnapshot
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Source	WebSnapshot
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Page Title	Documents I Am Brook Jackson
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MD5 hash version	v6
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Page Title	Documents I Am Brook Jackson
URI	ws://IABJ20220407/1649382172366

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MD5 hash version	v6
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Page Title	Documents I Am Brook Jackson
URI	ws://IABJ20220407/1649382188601

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Source	WebSnapshot
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Page Title	Documents I Am Brook Jackson
URI	ws://IABJ20220407/1649382204822

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Field Name	Value
Source	WebSnapshot
Ingesting Scanner Version	6.0.0.2004
MD5 hash	A121959B56072B993D5C6B3822361C6E
MD5 hash version	v6
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Page Title	Documents I Am Brook Jackson
URI	ws://IABJ20220407/1649382220563

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Field Name	Value
Source	WebSnapshot
Ingesting Scanner Version	6.0.0.2004
MD5 hash	7BF86DF0156AB4DABE2267F30D2966AB
MD5 hash version	v6
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Page Title	Documents I Am Brook Jackson
URI	ws://IABJ20220407/1649382239874

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Field Name	Value
Source	WebSnapshot
Ingesting Scanner Version	6.0.0.2004
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Page Title	Documents I Am Brook Jackson
URI	ws://IABJ20220407/1649382256607

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Field Name	Value
Source	WebSnapshot
Ingesting Scanner Version	6.0.0.2004
MD5 hash	3BA75A1346FFAE309D50ACD33988F694
MD5 hash version	v6
URL	https://www.iambrookjackson.com/documentstore/e047c5b4-cd83-4f64-b18d-08eca8d147aa
Page Title	Documents I Am Brook Jackson
URI	ws://IABJ20220407/1649382271880

Case 1:21-cv-00008-MJT Document 40-1 Filed 05/17/22 Page 81 of 90 PageID #: 1589 Item: IABJ0000000037 (Metadata) **Preview**

Field Name	Value
Source	WebSnapshot
Ingesting Scanner Version	6.0.0.2004
MD5 hash	11A3065F8F5A0EE1166EDDEC8801A039
MD5 hash version	v6
URL	https://www.iambrookjackson.com/documentstore/70ea9cbb-9768-44f9-96d9-addd3d944f9c
Page Title	Documents I Am Brook Jackson
URI	ws://IABJ20220407/1649382289689

Case 1:21-cv-00008-MJT Document 40-1 Filed 05/17/22 Page 82 of 90 PageID #: 1590 Item: IABJ0000000038 (Metadata) **Preview**

Field Name	Value
Source	WebSnapshot
Ingesting Scanner Version	6.0.0.2004
MD5 hash	EA29F63C104353DF4B602A13342E5A89
MD5 hash version	v6
URL	https://www.iambrookjackson.com/interviews
Page Title	MyInterviews
URI	ws://IABJ20220407/1649382305464

Case 1:21-cv-00008-MJT Document 40-1 Filed 05/17/22 Page 83 of 90 PageID #: 1591 Item: IABJ0000000039 (Metadata) **Preview**

Field Name	Value
Source	WebSnapshot
Ingesting Scanner Version	6.0.0.2004
MD5 hash	75A365EA379016C9A0D455710412C779
MD5 hash version	v6
URL	https://www.iambrookjackson.com/contact-8
Page Title	Contact I Am Brook Jackson
URI	ws://IABJ20220407/1649382321675

Exhibit 2



Templates

Wix.com

Looks Like This Domain Isn't Connected To A Website Yet!

Is this your domain?
Connect it to your Wix website in just a few easy steps:

- 1. Go to Wix.com > Subscriptions > Domains
- 2. Click Use a Domain You Already Own
- 3. Follow the steps to connect your domain to your website

Need more help?
Please contact our **Support Team**

Exhibit 3

Page 1 Brook Jackson on Twitter: "Defendants' false records went to the very essence of the bargain the United States contracted for. DoD contracted to purchase vaccines found effective by a valid clinical trial conducted according to the protocol submitted by Pfizer. The integrity of the entire clinical trial 1/" / Twitter

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Trending with #AEWDynamite, Brian

Promoted by Pam & Tommy on Hulu

CNBC Make It . 3 hours ago

over \$109,000 selling NFTs

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airing on TBS

Honda

#PamAndTommy 🌯

Now Streaming on Hulu

All Elite Wrestling: Dynamite

Trending with #AEWDynamite, Brian

Promoted by Pam & Tommy on Hulu

CNBC Make It 🐶 - 3 hours ago 'I had \$10 in my bank account':

over \$109,000 selling NFTs

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20.1K Tweets

Jimbo

paycheck to paycheck to making

Dash camera footage of a highway car crash

This 36-year-old went from living

'I had \$10 in my bank account':

This 36-year-old went from living

paycheck to paycheck to making

@lamBrookJackson

Clinical Data Sciences

Dash camera footage of a highway car crash

airing on TBS

Honda

Jimbo

#PamAndTommy 🐴

Now Streaming on Hulu

Brook Jackson

@lamBrookJackson

Clinical Data Sciences

Follow



Exhibit 4



From: Brook Jackson

September 19, 2021 at 12:17:17 PM CDT firm.com>

Subject: Re: Pain in your ASS

Just re-read my email....wanted to correct that Scalise and Comer aren't senators, but congressmen.

Sent from my iPhone

On Sep 19, 2021, at 10:37 AM, Brook Jackson brookjackson04@gmail.com wrote:

There has been an obvious shift in the scientific community with regard to the vaccine. Why pump the brakes now and "follow the science?" This may be a question for Drs. Gruber and Krause who put in their notice and will leave their assignments is October and November, respectively; however, the committees and rules that Sen. Scalise and Comer reference in their letter to FDA clearly define the reach and ability to investigate further.

The advisory committee sent a clear message last Friday about the vaccine. More research and data transparency is vital and key to the questions these scientists are finally asking!

for 20 fucking years I have been a part of a process, a clinical trial process that I believed in and that I was proud of; one that I thought was ethical and that the FDA would apply all scientific

principles and rigor to, but I was wrong. I now understand it's all political and big pharma doesn't give two cents about the American people, BUT I DO! THEY MATTER TO ME!

So, my questions are, I guess, without revealing the qui tam, why can't we talk about anything? Understanding the media ecosystem, we would obviously have to choose an appropriate network, but why can't I tell my story?

Doesn't that bother you? Why am I risking everything being swept away in a moment in time that's better than any one that's been in front of our face before with recent events, by not going public?

Maybe you'll drop me as a client, I don't know, but I don't want to do this anymore. I'm sorry.

BLJ